

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ERIC BERNARD,)	
)	
Plaintiff,)	
)	Case No. 20-CV-5383
)	
v.)	
)	Honorable Judge Lindsay C. Jenkins
ILLINOIS DEPARTMENT OF)	
CORRECTIONS, <i>et al.</i> ,)	
)	
Defendants.)	

STATUS REPORT OF IDOC DEFENDANTS' COUNSEL MANASSEH KONADU

Defendants, Jeffreys, Baldwin, Pfister, Williams, Jaburek, Jenkins, Montes, Miles, Rahimi, Rice, and Watson ("Defendants"), through undersigned counsel, Kwame Raoul, Attorney General for the State of Illinois, respectfully submit this status report:

1. As of the submission of this status report, the following outstanding discovery responses have been served to Plaintiff's counsel:

Request	Status	Actions taken
2nd Interrogatories - Def. Jeffreys	Sent to Plaintiff on 02/10/25	Completed.
1 st Request for Admission – Def. Jeffreys	Revised versions sent to Plaintiff on 2/10/25	Completed.
2 nd Interrogatories - Def. Miles	Sent to Plaintiff on 2/25/25	Completed.

1 st Request for Admission – Def. Miles	Sent to Plaintiff on 2/25/25	Completed.
1 st Request for Admission – Def. Pfister	Revised versions sent to Plaintiff 2/25/25	Completed.
1 st Interrogatories – Def. Pfister	Sent to Plaintiff on 2/25/25	Completed.
1 st Request for Admission – Def. Baldwin	Sent to Plaintiff on 2/10/25	Completed.
1 st Interrogatories – Def. Baldwin	Sent to Plaintiff on 2/25/25	Completed.
1 st Request for Admission – Def. Williams	Outstanding	The undersigned first attempted to contact Defendant Williams on November 26, 2024 and received no response. On November 26, 2024, the undersigned was notified by IDOC staff that Mr. Williams is no longer employed by IDOC and was given his contact information. On 11/26/24, 1/15/25, 2/19/25, 2/20/25, the undersigned reached out to Mr. Williams

		via telephone, left voicemails and left text messages. To date Defendant Williams has yet to respond.
1 st Interrogatories – Def. Williams	Outstanding	The undersigned reached out to the last email address given to IDOC by Defendant Williams on 11/26/24 and received no response. On 11/26/24, the undersigned was notified by IDOC staff that Mr. Williams is no longer employed by IDOC and was given his contact information. On 11/26/24, 1/15/25, 2/19/25, 2/20/25, the undersigned reached out to Mr. Williams via telephone, left voicemails and left text messages. To date Defendant Williams has yet to respond.
1 st Request for Admission – Def. Jaburek	Sent to Plaintiff on 2/10/25	Completed.
1 st Interrogatories – Def. Jaburek	Sent to Plaintiff on 2/25/25	Completed.

1 st Request for Admission – Def. Jenkins	Outstanding	The undersigned sent an email to Defendant Jenkins’ IDOC email on 11/26/24. On 1/22/25 the undersigned sent an email to Defendant’s personal email regarding the outstanding discovery and received no response. On 2/5/25, the undersigned sent out another email to Defendant’s personal email and received no response. On 2/20/25, the undersigned called and texted Defendant’s personal phone number and received no response.
1 st Interrogatories – Def. Jenkins	Outstanding	The undersigned sent an email to Defendant Jenkins’ IDOC email on 11/26/24. On 1/22/25 the undersigned sent an email to Defendant’s personal email regarding the outstanding discovery and received no response. On 2/5/25, the undersigned sent out another email to Defendant’s personal email and received no response. On 2/20/25, the undersigned called and texted Defendant’s personal phone number and received no response.

1 st Request for Admission – Def. Montes	Sent to Plaintiff on 2/25/25	Completed.
1 st Interrogatories – Def. Montes	Sent to Plaintiff on 2/25/25	Completed.
1 st Request for Admission – Def. Rahimi	Sent to Plaintiff on 2/25/25	Completed.
1 st Interrogatories – Def. Rahimi	Sent to Plaintiff on 2/25/25	Completed.
1 st Request for Admission – Def. Rice	Sent to Plaintiff on 2/10/25	Completed.
1 st Interrogatories – Def. Rice	Sent to Plaintiff on 2/10/25	Completed.
1 st Request for Admission – Def. Watson	Sent to Plaintiff on 2/10/25	Completed.
1 st Interrogatories – Def. Watson	Sent to Plaintiff on 2/25/25	Completed.

<p>1st Request for Production – IDOC Defendants</p>	<p>Sent to Plaintiff on 2/10/25. Supplemented responses on 2/25/25.</p>	<p>The undersigned to date has produced 13,065 pages of documents. The documents include: Plaintiff's medical record, Plaintiff's Crisis watch logs, Plaintiff's mental health records, Plaintiff's consultation records, Plaintiff's Administrative Review Board record, Plaintiff's discipline record, Plaintiff's movement and active living unit record, IDOC's ADA policies, Plaintiff's Stateville incident reports, Plaintiff's Cumulative Counseling History records, Plaintiff's facility grievances, Offender Health Services Administrative Directives, Religious Services Administrative Directives, Educational Programs Administrative Directives, ADA Coordinator Training Manual, and ADA Coordinator Training PowerPoint. Defendants remain committed to locating more responsive documents but believe that 13,065 documents are reasonable for a</p>
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		case regarding Plaintiff's five-month stay at Stateville Correctional Center.
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Date: February 25, 2025

Respectfully submitted,

KWAME RAOUL

Attorney General of Illinois
Attorney for Defendants

by /s/ Manasseh Konadu
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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2025, the foregoing document, *IDOC Defendants' Status Report*, was electronically filed with the Clerk of the Court using the CM/ECF system.

Manasseh Konadu
MANASSEH KONADU